

**REMARKS**

Applicant appreciates the brief Telephone Conference with Examiner Kumar wherein it was agreed that a requested Telephone Conference would be reserved to a later date, with the understanding that the applicant may have to file a Request for Continued Examination if new issues are raised.

The Office Action raised an issue with regards to Claims 1-4, 6-12 and 14-28 under 35 U.S.C. §112 as to whether there was adequate support for a supporter roller unit to be driven by contact with the rotatable belt or the passing coin.

Reference can be made to Paragraph 0005, the last sentence, which states “the supporting roller can move relative to the coin transporting unit when contacted by a coin on the belt.”

As can be seen in Figures 5-10, the rollers 68 and 70 are mounted at the end of a lever arm 64. See also Paragraph 0012 which states that the supporter unit pushes the coin into the coin transporting unit or flexible rotatable belt and “is rotated by movement of the coin.” See also Paragraph 0016 which states “because the supporting roller has contact with the transporting unit and is rotated by the coin transporting unit. In this structure, when there are no coins, the supporting roller rotates when it has a contact with the coin transporting unit.”

See also Paragraph 0045 which states “in a normal situation, supporting rollers 68 and 70 have contact with the coin surface 44 of the belt 30 and are rotated.”

There are other examples that support this teaching in addition to Figures 5-10. It is believed, however, that applicant has more than adequately disclosed the description support under 35 U.S.C. §112.

Finally, the Office Action raised an issue on Paragraph 0047 about a force from the lever 64. It is believed that the Examiner is actually referring to Paragraph 0045 and the lever 64 is

pivoted at the center of the separating roller and includes the weight of the lever and the rollers 68 and 70 at the end of the lever, as can be seen, for example, in Figure 5. The weight of these rollers and the lever arrangement provides a downward force that is being referred to, not a rotational force driving the individual supporting rollers 68 and 70.

Thus, it is the movement arm of force from the weight of the lever 64 and the rollers 68 and 70 that can push downward on a coin as shown in Figure 5. (Note, rotation of the rollers is caused by the belt/coin contact) This downward force is set forth in numerous places throughout the specification such as Paragraph 0010 that states "however, the coin is pushed into the coin transporting unit (rotatable belt 30) by the supporter unit. Therefore, the friction between the coin and the transporting unit is larger. Accordingly, the coin transporter unit is bent downward by the coin and the coin is drawn between the coin transporter unit and the separating unit."

If there are any additional questions with regards to 35 U.S.C. §112, the undersigned attorney can be contacted at the listed phone number.

The present invention provides a very economical and uncomplicated separating action by using a flexible rotatable belt, a fixed separating roller that rotates counterclockwise to the movement of the belt, and a supporter unit that has the capacity to remove piled up coins on the belt and to facilitate pushing the coin into the coin transporting unit or rotatable belt to facilitate a positive driving of the coin. This is set forth as follows, on Page 4:

[0011]

The present invention is desirable, because the coin transporting unit can resiliently bend the coin supporting surface in a traverse direction to the coin moving direction, and the position of the separating roller is fixed at a predetermined position. In this structure, the separating roller rotates. Therefore, the driving mechanism can be made both relatively uncomplicated and inexpensively. Also, the transporting unit can bend based on a predetermined self-elasticity to alter the distance through which a coin can pass. This function occurs based on a tension control feature of

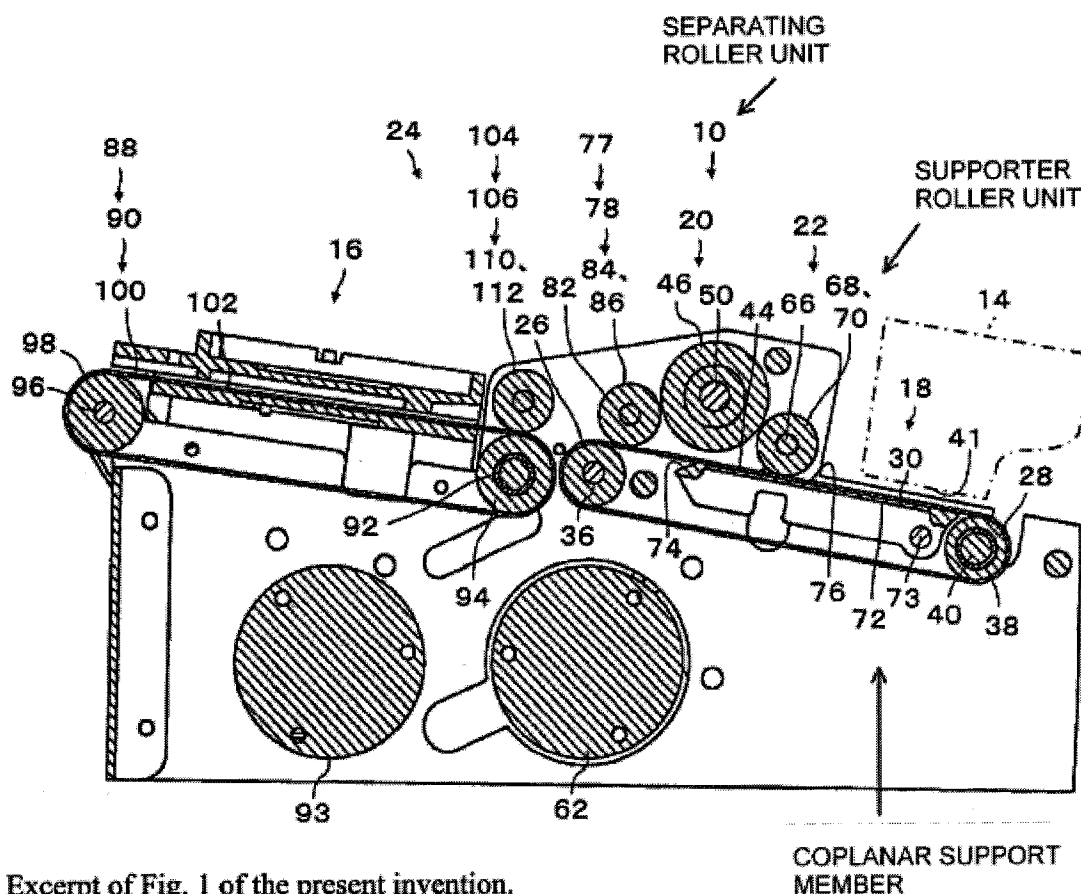
the transporting unit. Therefore, the unit is inexpensive and rarely breaks down, because the structure is simple.

[0012]

This present invention is further desirable, because the supporter unit is a roller. In this structure, the supporter unit pushes the coin into the coin transporting unit and is rotated by the movement of the coin. Therefore, when the supporter unit runs up onto the coin, the supporter unit does not substantially provide a large resistance to the coin, because the supporter rotates. Also, the breaking up of the piled up coins is smooth.

The present invention as set forth in our claims defines a belt supporter or co-planar support member which has a function of controlling the amount of bending of the belt 30. As noted in Paragraph 0062, the coin is drawn into the space between the separating roller 20 and the belt 30. The belt 30 bends resiliently and the belt supporter 72 beneath the belt 30 also moves together with the belt 30 by pivoting in a counterclockwise direction at shaft 73 as shown in Figure 3. Thus, the separating function of passing only one coin is enabled.

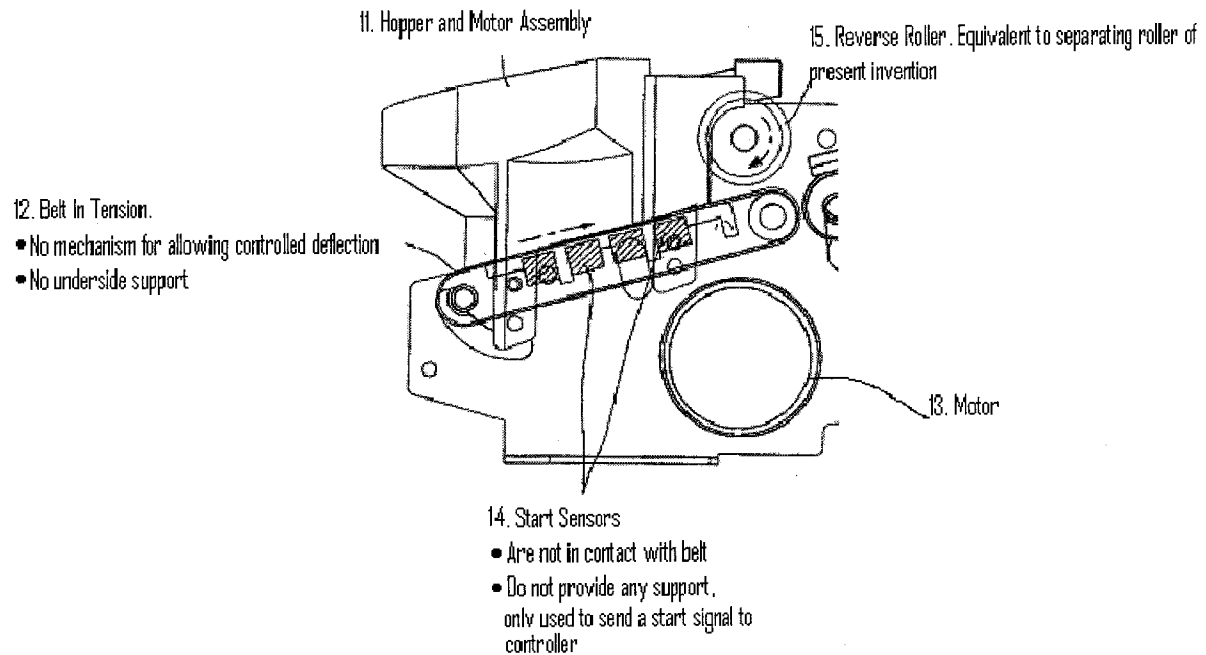
The proposed Claim 1 amended, can be seen from the cross-sectional view of Figure 1 of the present application as follows.



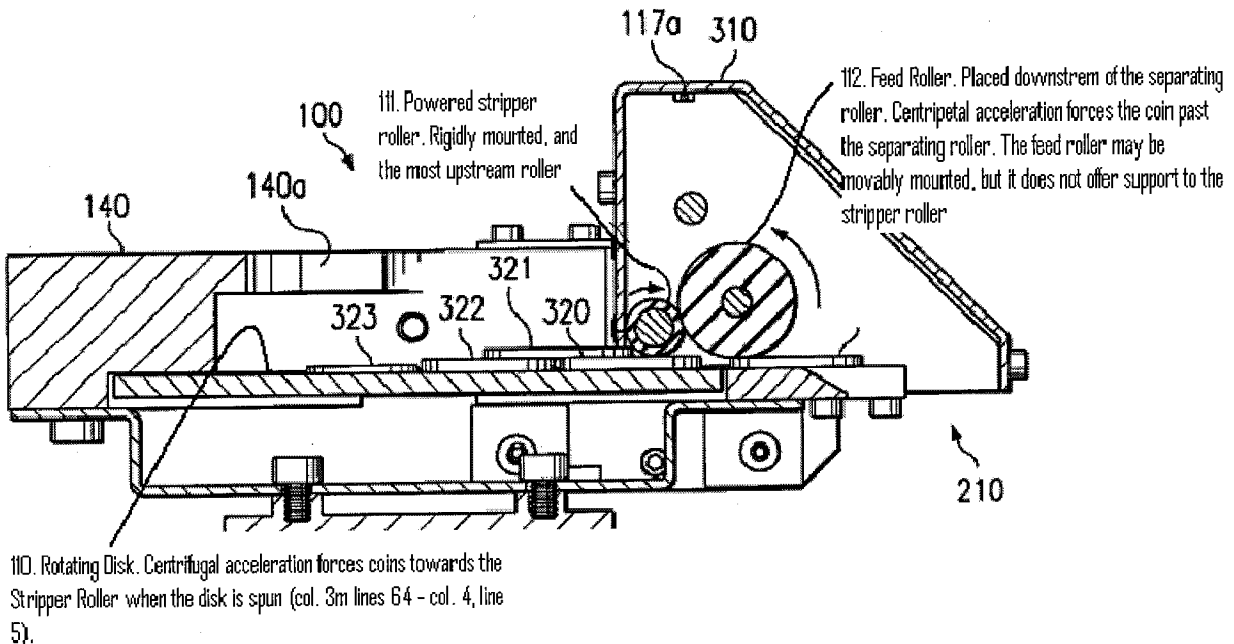
Excerpt of Fig. 1 of the present invention.

As can be seen, the separating unit 10, the support roller unit 70 and the flexible rotatable belt include a pivoting coplanar support member 72 located between the upper and lower portions of the belt of the coin transporting unit 18. The support member 72 can be moved downward to a pre-determined distance to enable a single coin to be released below the separating roller unit. See Paragraphs 0050, 0051.

The original Claim 1 was rejected over the *Furikawa* reference in view of the *Stoltz et al.* reference. The *Furikawa* reference is shown as follows:



Relevant portion of Fig. 4 from the *Stoltz* reference.



Additionally, the Office Action rejected Claim 22 that depended on Claim 1 by further citing the *DeVries et al.* reference as follows.

The adjacent Figures depict the scraper system of Figure 12 installed on a conveyer system.

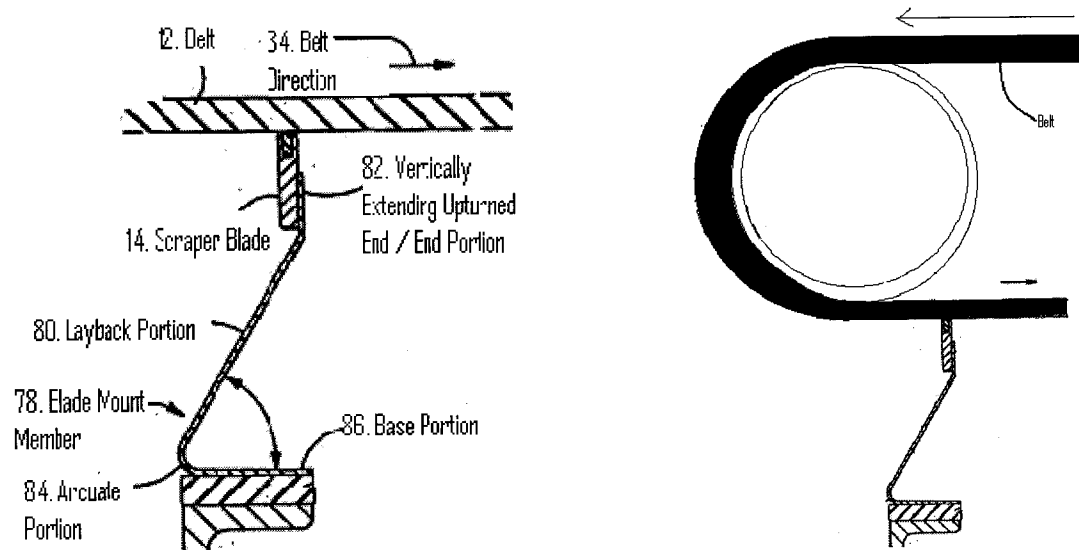
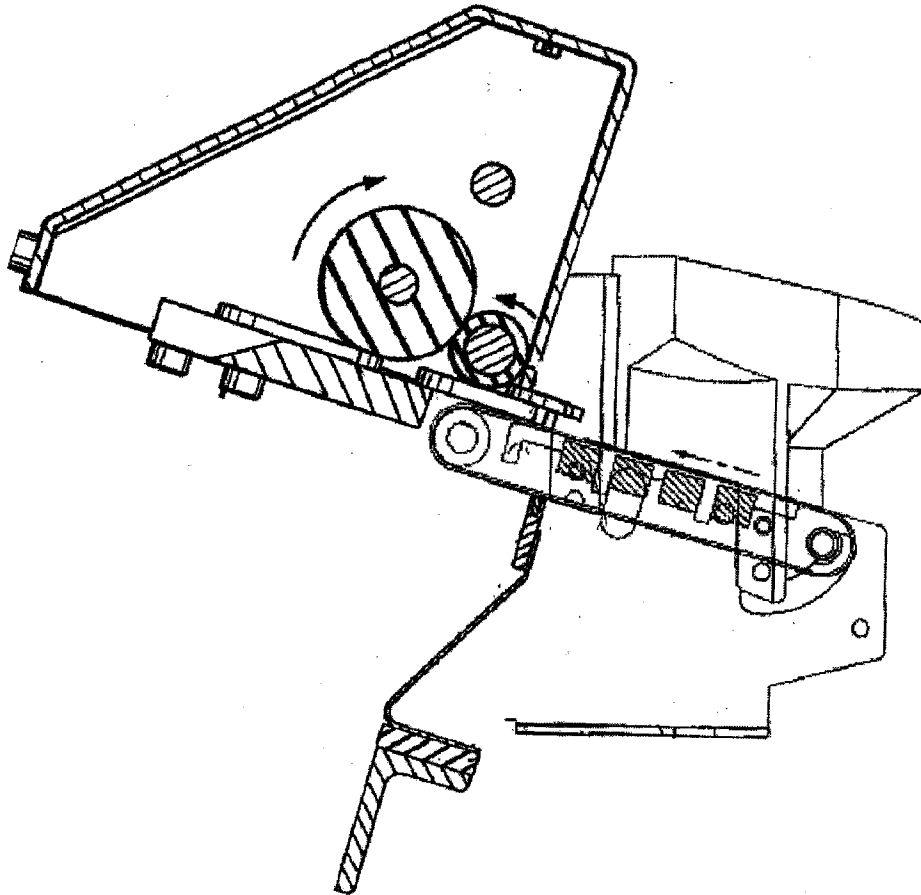


Fig. 12 from the DeVries *et al.* reference.

*DeVries* as installed on conveyer.

The following Figures show a hypothetical combination of the prior art references and the present invention. A comparison of the two Figures will reveal that the supporter unit including supporter roller members 68 and 70 and coplanar pivoting support member 72 of our invention have no equivalents in the cited prior art.



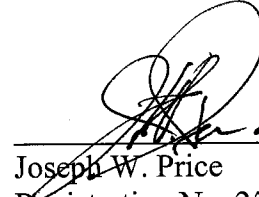
Hypothetical combination of *Furukawa, Stoltz, and DeVries et al.*

In view of the amendments to the claims and the above comments, it is believed the case is now in condition for allowance and an early notification of the same is requested.

If the Examiner believes a telephone interview will help further the prosecution of this case, the undersigned attorney can be contacted at the listed telephone number.

Very truly yours,

**SNELL & WILMER L.L.P.**

A handwritten signature in black ink, appearing to read 'J. Price', is written over a horizontal line.

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